

REMARKS

I. Status Summary

Claims 1-5, 7-28, 30-35, and 37-51 are pending in the present application. Claims 1-5, 7-28, 30-35, and 37-51 presently stand rejected. By this amendment, claims 1, 23, 30, 37, and 46-51 have been amended. A Request for Continued Examination (RCE) is filed concurrently herewith.

II. Claim Rejections – 35 U.S.C. § 103

Claims 1-5, 7-15, 20, 21, 23-28, 37-39, 41, 43, 44, and 46-51 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Number 5,036,984 to Labarthe, in view of U.S. Patent No. 6,168,080 to Verschuur, and further in view of U.S. Patent No. 5,819,241 to Reiter.

Claims 16-18 and 39-41 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Labarthe, Verschuur, and Reiter in view of U.S. Patent No. 6,073,060 to Robinson.

Claims 19, 22, 42, and 45 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Labarthe, Verschuur, and Reiter in view of U.S. Patent No. 4,858,907 to Eisener et al.

Claims 30-35 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Labarthe, Verschuur, and Reiter in view of U.S. Patent Application Serial No. 2001/0032881 to Wells et al.

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Applicant has carefully studied the Examiner's comments and contentions set forth in the Official Action and respectfully submits that the presently claimed subject matter is not rendered obvious by any combination of the cited references. The Examiner's rejections based on 35 U.S.C. § 103(a) are respectfully traversed as discussed below.

A. Labarthe in view of Verschuur

(i) Examiner's Argument

Claims 1-5, 7-15, 20, 21, 23-28, 37-39, 41, 43, 44, and 46-51 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe, in view of Verschuur, and further in view of Reiter.

The Examiner has maintained the rejections based on Labarthe in view of Verschuur as set forth in the first, second, and third Official Actions, but has added a new reference, Reiter, in response to applicant's amendments in the previously filed Amendment C. In particular, the Examiner acknowledges that Labarthe and Verschuur do not specifically disclose that a data file containing account information is accessed and compared with information on and within the envelope. The Examiner contends, however, that Reiter discloses that account files are maintained and may be printed on a mailpiece for OCR detection (referring to column 2, line 29-40 of Reiter). Therefore, the Examiner contends that it would have been obvious to one of ordinary skill in the art at the time of the invention to combine the optical envelope processing systems of

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Labarthe and the envelope content accessing system of Verschuur with the disclosure in Reiter of maintaining an account file, because this would speed the delivery process, etc. (referring to column 2, lines 59+ of Reiter).

Applicant respectfully traverses the rejections based upon Labarthe, Verschuur, and Reiter as discussed below.

(ii) Response To Examiner's Argument

The shortcomings of Labarthe in relation to the present subject matter have been discussed in further detail in previously filed Amendments. Particularly, Labarthe merely teaches the use of a first optical reader for reading address data on the outside of an envelope or for reading address data readable through an envelope window. As the Examiner acknowledges, Labarthe does not disclose a second reading device that optically reads a document contained within the envelope (in addition to a first reading device). As the Examiner additionally acknowledges, Labarthe does not disclose that a data file containing account information is accessed and compared with information on and within the envelope.

The shortcomings of Verschuur, even if combined with Labarthe, in relation to the present subject matter have also been discussed in further detail in previous Amendments. Particularly, Verschuur merely teaches a system for acquiring encoded information from the contents of sealed envelopes by means of a transducer that measures changes in capacitance of a localized region beneath the surface of the envelope (i.e., no optical reading of envelope content

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information by the detector of Verschuur). Additionally, Verschuur makes a direct comparison between information obtained from the envelope and information obtained from the contents (such as an address - address comparison) to verify if they match and to discontinue processing of the envelopes upon detection of a mismatch (i.e., does not use package data separate and apart from address data to compare with document data). As the Examiner acknowledges, Verschuur also does not disclose that a data file containing account information is accessed and compared with information on and within the envelope.

As discussed above, the Examiner acknowledges that Labarthe and Verschuur do not disclose that a data file containing account information is accessed and compared with information on and within the envelope. However, the Examiner contends that Reiter discloses that account files are maintained and may be printed on a mailpiece for OCR detection (referring to column 2, line 29-40 of Reiter). Therefore, the Examiner contends that it would have been obvious to one of ordinary skill in the art at the time of the invention to combined the optical envelope processing systems of Labarthe and the envelope content accessing system of Verschuur with the disclosure in Reiter of maintaining an account file, because this would speed the delivery process, etc. (referring to column 2, lines 59+ of Reiter).

Reiter is directed to an interactive process in which a database of demographic and other relevant information is used to selectively apply specific,

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targeted information, such as advertisements, coupons, or messages onto a letter or parcel, if there is a match between the sender and/or recipient information on the letter or parcel and the information in the database. Reiter is also directed to a process for billing a parcel sender for the delivery of the parcel based on sender's account information stored in a database and printed on the parcel for OCR detection. As discussed in Reiter, when the sender and receiver information (such as name, address, and zip code) are both known, the sender's account is known to the letter or parcel delivery service. Therefore the sender can be billed directly for the delivery which might be based upon the size, weight, priority, distance, or destination of the letter or parcel. In a particular embodiment of Reiter cited by the Examiner (with reference to column 2, lines 29-40 of Reiter), the sender's account information can be printed, coded, or applied in such a way to allow the OCR equipment to read the information. With this system, traditional postage stamps or large volume mail permits are no longer required, and letters and parcels can be priced based upon size, weight, priority, distance, or destination.

The present application teaches verification of matching associations between data printed on a closed face package (package data) that corresponds to account information corresponding to a mail recipient and data printed on an inserted document (document data) which corresponds to the inserted document as well as to the account information. The package data is distinct from address data that can also be additionally present and printed on

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the package. The address data printed on the package corresponds to the account information, including recipient address information. In order to better clarify and more particularly point out various patentable subject matter, independent claims 1, 23, 30, 37, and 46-51 have been amended as set forth above and described in detail below.

Independent claim 1 is directed to a method for verifying a correct association between information printed on a closed face package and material and/or information contained within the package. The package has a window permitting a portion of a document inserted within the package to be read optically from a location outside of the package. As presently amended, the package comprises package data printed on the package and corresponding to account information corresponding to a mail recipient; document data printed on the inserted document, the document data corresponding to the inserted document and corresponding to the account information; and address data printed on the package and corresponding to the account information including recipient address information. Therefore, the present subject matter of claim 1 utilizes separate data types (package data, document data, and address data) which each correspond to at least a portion of the account information corresponding to a mail recipient. As also presently amended, a data file is provided to access the account information stored therein, wherein the data file corresponds to the package data, the document data, and the address data. Claim 1 also recites using a first reading device to optically read the printed

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package data on the package and using a second reading device to optically read printed document data on the inserted document and appearing through the window in the package. These first and second readers therefore utilize optical reading of the package and inserted document (e.g., unconcealed data) and are designed for reading of the package data, which is distinct from the address data and the document data.

Claim 1 further recites reading of the data file to access the account information stored therein and comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the document data to determine whether a matching association exists between the package data and the document data. Therefore, rather than the package data and document data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the document data is utilized and the account information is compared with both the package data and the document data to determine whether a matching association exists between the package data and the document data. Although not excluded, it should be noted that the claim does not expressly require use of the external data file to effect a comparison between address data (a data set separate and apart from the package data) and the document data, but rather utilizes a comparison between the package data and the document data. As such, an address comparison does not meet the relevant claim elements.

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Claim 1 further recites that if the matching association is determined to exist, the package is allowed to be further processed, and if the matching association is determined not to exist, the package is prevented from being further processed.

Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, the features of amended independent claim 1. Specifically, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, the provision of separate data types (package data, document data, and address data) which each correspond to at least a portion of account information corresponding to a mail recipient, wherein first and second reading devices optically read the package data (that is distinct from the address data) and the document data, respectively. Additionally, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination: providing a data file to access the account information stored therein, the data file corresponding to the package data, the document data, and the address data; reading of the data file to access the account information stored therein; and comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the document data to determine whether a matching association exists between the package data and the document data.

As discussed in previous amendments, Labarthe actually describes a first reader capable of reading a payee's address (either printed on the outside



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of the envelope or visible through an envelope window), and there is no disclosure in Labarthe of optically reading package data that is distinct from address data and also reading insert document data for matching of the data with an external data file for envelope processing. Also as described in previous amendments, Verschuur does disclose reading address data on the outside of an envelope using a conventional optical reader (similar to that in Labarthe), but a comparison of this information with identifying information acquired from the envelope contents requires use of its transducer as described above rather than resulting from a second optical reading. Furthermore, the comparison made between the envelope address data and insert data, according to Verschuur, is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison. It does not involve reading an external data file and comparing portions of account information from that data file to read package data separate from address data and read document data in order to determine whether a matching association exists between the package data and document data. As described above, the Examiner relies upon Reiter contending that Reiter teaches that a data file containing account information is accessed and compared with information on and within the envelope. However, applicant notes that the particular embodiment of Reiter referred to by the Examiner merely discloses that a data file can be accessed for a sender's account information, which can then be printed, coded, or applied in such a way

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to allow OCR equipment to read the information so that the sender can be directly billed for the parcel.

Summarily, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, the features of amended independent claim 1, including: (1) separate data types (package data, document data, and address data); (2) comparing package data (apart from address data) and document data; and (3) comparing the data through an indirect comparison process utilizing a data file.

Independent claim 23 is directed to a system for verifying a correct association between information printed on a closed face package and material and/or information contained inside the package. As presently amended, a first optical reader is adapted to optically read package data printed on a closed face package and corresponding to account information corresponding to a mail recipient, the closed face package containing a document and including a window through which the document is visible, wherein the first optical reader is adapted to send the package data to an electronic processing apparatus. As further amended, a second optical reader is adapted to optically read document data printed on the document and appearing through the window in the package, the document data corresponding to the document and corresponding to the account information, wherein the second optical reader is adapted to send the document data to an electronic processing apparatus. As also presently amended, claim 23 additionally recites a storage medium containing a

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data file that includes the account information, the data file corresponding to the package data, the document data, and address data printed on the package, the address data corresponding to the account information including recipient address information.

Therefore, the present subject matter of claim 23 utilizes separate data types (package data, document data, and address data) which each correspond to at least a portion of the account information corresponding to a mail recipient. Claim 23 further recites an electronic processing apparatus adapted to access the data file and retrieve data forming a part of the account information and to compare at least a portion of the data forming a part of the account information with the package data and to compare at least a portion of the data forming a part of the account information with the document data to determine whether a matching association exists between the package data and the document data. Therefore, rather than the package data and document data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the document data is utilized and the account information is compared with both the package data and the document data to determine whether a matching association exists between the package data and the document data. Although not excluded, it should be noted that the claim does not expressly require use of the external data file to effect a comparison between address data (a data set separate and apart from the package data) and the document data, but rather utilizes a

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comparison between the package data and the document data. As such, an address comparison does not meet the relevant claim elements.

Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, the features of amended independent claim 23. Specifically, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, providing separate data types (package data, document data, and address data) which each correspond to at least a portion of account information corresponding to a mail recipient, wherein first and second reading devices are adapted to optically read the package data (that is distinct from the address data) and the document data, respectively. Additionally, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination: a storage medium containing a data file that includes the account information and corresponding to the package data, the document data, and the address data; and an electronic processing apparatus adapted to access the data file and retrieve data forming a part of the account information and to compare at least a portion of the accessed account information with the package data and to compare at least a portion of the accessed account information with the document data to determine whether a matching association exists between the package data and the document data.

As discussed above, there is no disclosure in Labarthe of optically reading package data that is distinct from address data and also reading insert document data for matching of the data with an external data file for envelope

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processing. Also, while Verschuur does disclose reading address data on the outside of an envelope using a conventional optical reader (similar to that in Labarthe), a comparison of this information with identifying information acquired from the envelope contents requires use of its transducer as described above rather than resulting from a second optical reading. Furthermore, the comparison made between the envelope address data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of portions of account information from that data file to read package data separate from address data and read document data in order to determine whether a matching association exists between the package data and document data. With reference to Reiter, the particular embodiment referred to by the Examiner merely discloses that a data file can be accessed for sender's account information, which can then be printed, coded, or applied in such a way to allow OCR equipment to read the information so that the sender can be directly billed for the parcel.

Summarily, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, the features of amended independent claim 23, including: (1) separate data types (package data, document data, and address data); (2) comparing package data (apart from address data) and document

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data; and (3) comparing the data through an indirect comparison process utilizing a data file.

Independent claim 30 is directed to a mailpiece processing system including a mailpiece processing apparatus having a mail inserting device for inserting a document into a closed face package and a package printer for printing package data onto the closed face package. As presently amended, a first optical reader is adapted to optically read package data printed on the closed face package and corresponding to account information corresponding to a mail recipient, the closed face package containing the document inserted by the mail inserting device and including a window through which the document is visible, wherein the first optical reader is adapted to send the package data to an electronic processing apparatus. As further amended, a second optical reader is adapted to optically read document data printed on the document and appearing through the window in the package, the document data corresponding to the document and corresponding to the account information, wherein the second optical reader is adapted to send the document data to an electronic processing apparatus. As also presently amended, claim 30 additionally recites a storage medium containing a data file that includes the account information, the data file corresponding to the package data, the document data, and address data printed on the package, the address data corresponding to the account information including recipient address information.

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Therefore, the present subject matter of claim 30 utilizes separate data types (package data, document data, and address data) which each correspond to at least a portion of the account information corresponding to a mail recipient. Claim 30 further recites an electronic processing apparatus adapted to control operations of the mailpiece processing apparatus, to access the data file and retrieve data forming a part of the account information, and to compare at least a portion of the data forming a part of the account information with the package data and to compare at least a portion of the data forming a part of the account information with the document data to determine whether a matching association exists between the package data and the document data. Therefore, rather than the package data and document data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the document data is utilized and the account information is compared with both the package data and the document data to determine whether a matching association exists between the package data and the document data. Although not excluded, it should be noted that the claim does not expressly require use of the external data file to effect a comparison between address data (a data set separate and apart from the package data) and the document data, but rather utilizes a comparison between the package data and the document data. As such, an address comparison does not meet the relevant claim elements.

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Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, the features of amended independent claim 30. Specifically, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, separate data types (package data, document data, and address data) which each correspond to at least a portion of account information corresponding to a mail recipient, wherein first and second reading devices are adapted to optically read the package data (that is distinct from the address data) and the document data, respectively. Additionally, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination: a storage medium containing a data file that includes the account information and corresponding to the package data, the document data, and the address data; and an electronic processing apparatus adapted to access the data file and retrieve data forming a part of the account information and to compare at least a portion of the accessed account information with the package data and to compare at least a portion of the accessed account information with the document data to determine whether a matching association exists between the package data and the document data.

As discussed above, there is no disclosure in Labarthe of optically reading package data that is distinct from address data and also reading insert document data for matching of the data with an external data file for envelope processing. Also, while Verschuur does disclose reading address data on the outside of an envelope using a conventional optical reader (similar to that in



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Labarthe), a comparison of this information with identifying information acquired from the envelope contents requires use of its transducer as described above rather than resulting from a second optical reading. Furthermore, the comparison made between the envelope address data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of portions of account information from that data file to read package data separate from address data, and read document data in order to determine whether a matching association exists between the package data and document data. With reference to Reiter, the particular embodiment referred to by the Examiner merely discloses that a data file can be accessed for a sender's account information, which can then be printed, coded, or applied in such a way to allow OCR equipment to read the information so that the sender can be directly billed for the parcel.

Summarily, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, the features of amended independent claim 30, including: (1) separate data types (package data, document data, and address data); (2) comparing package data (apart from address data) and document data; and (3) comparing the data through an indirect comparison process utilizing a data file.

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Independent claim 37 is directed to a computer program product adapted for verifying a correct association between information printed on a closed face package and material and/or information contained inside the package. The package has a window permitting a portion of a document inserted within the package to be read from a location outside of the package. As presently amended, optically read package data is received, wherein the package data is printed on the package and corresponds to account information corresponding to a mail recipient. Also as presently amended, optically read document data is received, wherein the document data is printed on the inserted document and appears through the window and wherein the document data further corresponds to the inserted document and corresponds to the account information. As further amended, claim 37 is also directed to reading a data file to access the account information stored therein, the data file corresponding to the package data, the document data, and address data printed on the package, the address data corresponding to the account information including recipient address information.

Therefore, the present subject matter of claim 37 utilizes separate data types (package data, document data, and address data) which each correspond to at least a portion of the account information corresponding to a mail recipient. Claim 37 further recites comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the document data to determine whether a

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matching association exists between the package data and the document data. Therefore, rather than the package data and document data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the document data is utilized and the account information is compared with both the package data and the document data to determine whether a matching association exists between the package data and the document data. Although not excluded, it should be noted that the claim does not expressly require use of the external data file to effect a comparison between address data (a data set separate and apart from the package data) and the document data, but rather utilizes a comparison between the package data and the document data. As such, an address comparison does not meet the relevant claim elements. Claim 37 further recites that if the matching association is determined to exist, the package is allowed to be further processed, and if the matching association is determined not to exist, the package is prevented from being further processed.

Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, the features of amended independent claim 37. Specifically, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, separate data types (package data, document data, and address data) which each correspond to at least a portion of account information corresponding to a mail recipient, wherein first and second reading devices are adapted to optically read the package data (that is distinct from the address

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data) and the document data, respectively. Additionally, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination: reading a data file to access the account information stored therein, the data file corresponding to the package data, the document data, and the address data; and comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the document data to determine whether a matching association exists between the package data and the document data.

As discussed above, there is no disclosure in Labarthe of optically reading package data that is distinct from address data and also reading insert document data for matching of the data with an external data file for envelope processing. Also, while Verschuur does disclose reading address data on the outside of an envelope using a conventional optical reader (similar to that in Labarthe), a comparison of this information with identifying information acquired from the envelope contents requires use of its transducer as described above rather than resulting from a second optical reading. Furthermore, the comparison made between the envelope address data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of portions of account information from that data file to read package data separate from address data and read document data in order to

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determine whether a matching association exists between the package data and document data. With reference to Reiter, the particular embodiment referred to by the Examiner merely discloses that a data file can be accessed for a sender's account information, which can then be printed, coded, or applied in such a way to allow OCR equipment to read the information so that the sender can be directly billed for the parcel.

Summarily, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, the features of amended independent claim 37 including: (1) separate data types (package data, document data, and address data); (2) comparing package data (apart from address data) and document data; and (3) comparing the data through an indirect comparison process utilizing a data file.

Independent claims 46-49 correspond essentially to claims 1, 23, 30 and 37, respectively, but all recite "insert material" and "insert data" instead of "material and/or information and document data", respectively. These claims have been amended similar to claims 1, 23, 30 and 37 above. As such, the arguments presented above in relation to claims 1, 23, 30 and 37 apply equally to claims 46-49, respectively.

Independent claims 50-51 correspond essentially to claims 1 and 37, respectively, but recite "optically reading" without reciting the "first and second reading devices". Further, claims 50-51 do not recite "providing and reading a data file" but recite "accessing account information from a data file."

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Accordingly, claims 50-51 have been amended similar to claims 1 and 37 above. As such, the arguments presented above in relation to claims 1 and 37 apply equally to claims 50-51, respectively.

Applicant respectfully submits therefore that Labarthe, Verschuur, and Reiter, either in combination or alone, fail to render obvious claims 1-15, 20, 21, 23-28, 37-39, 41, 43, 44, and 46-51.

B. Labarthe, Verschuur, and Reiter in view of Robinson

Claims 16-18 and 39-41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe/Verschuur/Reiter in view of Robinson. The Examiner has maintained the rejections based on Labarthe/Verschuur in view of Robinson as set forth in the first, second, and third Official Actions, and has included the addition of Reiter in this Official Action, as described above.

As described in previous Amendments, Robinson merely teaches a manually operated mail sorting station for sorting pieces of unsorted mail into numerous bins in a case for holding sorted mail. The sorting station includes a scanner that reads an address printed on the pieces of unsorted mail and communicates through an interface to a computer that stores the address in memory. The sorter includes detectors attached to non-matching bins that may send back an error signal over the connection between the case and the computer in the event they sense that the unsorted mail has been placed in a

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non-matching bin, wherein the error signal may sound an alarm, display an error message, or the like.

The manual mail sorting station disclosed in Robinson is designed solely for use with manual sorting of rejected letters to assigned delivery mapping schemes (delivery bins) and is not related to indirectly verifying that the enclosed contents of a mailpiece or other enclosure correctly match information printed on the mailpiece. Additionally, and as discussed above, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, a number of features of the presently claimed subject matter. Specifically, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, features including: (1) separate data types (package data, document data, and address data); (2) comparing package data (apart from address data) and document data; and (3) comparing the data through an indirect comparison process utilizing a data file. The addition of Robinson fails to overcome the significant shortcomings of the combination of Labarthe, Verschuur, and Reiter described above. Applicant respectfully submits therefore that no combination of Labarthe, Verschuur, and Reiter, even in combination with the prior art manual mail sorting station taught by Robinson, renders obvious claims 16-18 and 39-41.

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C. Labarthe, Verschuur, and Reiter in view of Eisener et al.

Claims 19, 22, 42, and 45 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe/Verschuur/Reiter in view of Eisener et al. The Examiner has maintained the rejections based on Labarthe/Verschuur in view of Eisener et al. as set forth in the first, second, and third Official Actions, and has included the addition of Reiter in this Official Action, as described above.

As described in previous Amendments, Eisener et al. teach an envelope feeding assembly for feeding of and printing on envelopes while the envelopes are in motion. This envelope feeding and printing assembly consists of a system as known in the prior envelope feeding art and has all of the disadvantages associated with prior envelope feeding systems wherein the enclosed contents of the envelope cannot be correctly verified with the printed address or other information on the outside of the envelope. Additionally, and as discussed above, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, a number of features of the presently claimed subject matter. Specifically, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, features including: (1) separate data types (package data, document data, and address data); (2) comparing package data (apart from address data) and document data; and (3) comparing the data through an indirect comparison process utilizing a data file. The addition of Eisener et al. fails to overcome the significant shortcomings of the



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combination of Labarthe, Verschuur, and Reiter described above. Applicant respectfully submits therefore that no combination of Labarthe, Verschuur, and Reiter, even in combination with the prior art envelope feeding and printing assembly taught by Eisener et al., renders obvious claims 19, 22, 42, and 45.

D. Labarthe, Verschuur, and Reiter in view of Wells et al.

Claims 30-35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe/Verschuur/Reiter in view of Wells et al. The Examiner has maintained the rejections based on Labarthe/Verschuur in view of Wells et al. as set forth in the first, second, and third Official Actions, and has included the addition of Reiter in this Official Action, as described above.

As described in previous Amendments, Wells et al. teach an automated electronic verification system operative at the point of creation of a mail piece to enhance customer tracking of mail pieces and other data exchange functions between the Postal service, mass mailers and their customers. Wells et al. is directed to verification of address information and postage value in order to enhance the revenue protection of the postal service and does not address the problems associated with prior art inserters and verifiers wherein the enclosed contents of an envelope cannot be correctly verified with the printed address or other information on the outside of the envelope. Additionally, and as discussed above, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, a number of features of the presently claimed

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subject matter. Specifically, Labarthe, Verschuur, and Reiter fail to teach or suggest, either alone or in combination, features including: (1) separate data types (package data, document data, and address data); (2) comparing package data (apart from address data) and document data; and (3) comparing the data through an indirect comparison process utilizing a data file. The addition of Wells et al. fails to overcome the significant shortcomings of the combination of the teachings of Labarthe, Verschuur, and Reiter described above. Applicant respectfully submits therefore that no combination of Labarthe, Verschuur, and Reiter, even in combination with the prior art postage value verifier taught by Wells et al., renders obvious claims 30-35.

#### E. Summary

In light of the above amendments and remarks, applicant respectfully submits that the cited references, either alone or in combination, fail to render obvious claims 1-5, 7-28, 30-35, and 37-51, and applicant submits that the rejection of these claims under 35 U.S.C. § 103(a) should be withdrawn and that the claims should be deemed allowable at this time.

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CONCLUSION

In light of the above amendments and remarks, it is respectfully submitted that the present application is now in proper condition for allowance, and an early notice to such effect is earnestly solicited.

If any small matter should remain outstanding after the Patent Examiner has had an opportunity to review the above amendments and remarks, the Patent Examiner is respectfully requested to telephone the undersigned patent attorney in order to resolve these matters and avoid the issuance of another Official Action.

FEE DUE

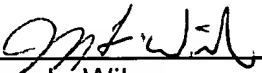
A check in the amount of \$790.00 is enclosed for the fee due. The Commissioner is authorized to charge any deficiencies of payment associated with the filing of this correspondence to Deposit Account No. **50-0426** to avoid the unintentional abandonment of the instant application.

Respectfully submitted,

JENKINS, WILSON, TAYLOR & HUNT, P.A.

Date: April 10, 2006

By:

  
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Jeffrey L. Wilson  
Registration No. 36,058  
Customer No.: 25297